

Joanne Norbut

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May 15, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, Maryland 20852  
Re: Docket # 98N-1038

In response to your request for comment about "Irradiation in the Production, Processing, and Handling of Food," FDA should ask Congress to authorize a label large enough to be readily visible to the consumer, on the front of the package. The label contains important information regarding the processing of the contents. For displayed whole foods such as produce, a prominent informational display similar to that used for meats should be used (but containing the term "irradiation" and the radura). The FDA should retain other aspects of current labeling law, current terminology of "treated with radiation" or "treated by irradiation," and the use of the radura symbol on all irradiated whole foods.

In its initial petition, the FDA concluded that irradiation was a "material fact" about the processing of a food, and thus should be disclosed. The material fact remains; therefore, labeling should remain. Consumer acceptability, storage qualities and nutrients are affected. Some irradiated foods have different texture and spoilage characteristics than untreated foods. Most fruits and vegetables have nutrient losses that are not obvious or expected by consumers. In addition, processing by irradiation causes chemical changes that are not evident and are potentially hazardous. Meat may have a higher level of carcinogenic benzene. All irradiated foods contain unique radiolytic products that have never been tested. Labels should alert consumers to the possible presence of these substances, and list only the nutrients that remain after irradiation.

Whether or not the FDA has approved irradiation as safe, it remains a new technology with no long-term human feeding studies. Consumers certainly have a right to know if this process has been used on their food. Labels are important for consumers who do believe in irradiation as a good solution to dangers of food-borne illness. The labels will help them find the irradiated foods. Likewise, they allow other consumers to decline irradiated foods and rely on judicious food-handling procedures and buy from suppliers they trust to do likewise.

Because the technology is new, FDA needs to assess the public health effects of widespread use of irradiated foods. Meanwhile, the FDA labeling requirement should not be permitted to expire.

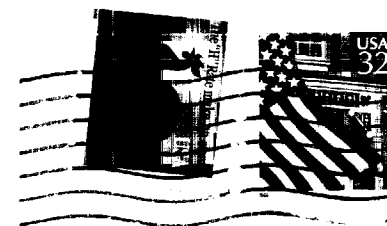
Sincerely,

*Joanne Norbut*  
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